

1 **KAIPAT_R.3dep**

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8
9 IN THE UNITED STATES DISTRICT COURT

10 FOR THE NORTHERN MARIANA ISLANDS

11 UNITED STATES OF AMERICA,)

CRIMINAL CASE NO. 99-00032

12 Plaintiff,)

13 vs.)

NOTICE OF INTENTION TO TAKE
THIRD PARTY ORAL DEPOSITION
WITH SUBPOENA DUCES TECUM

14 ROLAND KAIPAT,)

15 Defendant.)

16 TO: Nonito Roligat and Marina Kaipat

17 P.O. Box XXXXXX

18 Saipan, MP 96950

19 Please take notice that the United States of America, the plaintiff and judgment creditor
20 herein, will on May 20, 2008 take third party oral deposition of Nonito Roligat and Marina
21 Kaipat, in the above styled and number case pursuant to Rules 30 and 69(a) of the Federal Rules
22 of Civil Procedure and in aid of collecting its judgment.

23 Said third party deposition will take place at the offices of the United States Attorney, 3rd
24 Floor, Horiguchi Building, Garapan, Saipan, MP at 2:00 p.m. on May 20, 2008 and will continue
25 until completed. Said deposition will be taken before a Certified Court Reporter and will be
26 taken upon oral examination for the purpose of discovery or as evidence or both pursuant to the
27 Federal Rules of Civil Procedure.

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1 Notice is hereby further given that at this deposition, Nonito Roligat and Marina Kaipat,
2 are hereby required to produce all documents described in the accompanying Schedule A.

3 DATED, this 7th day of March, 2008.

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5 LEONARDO M. RAPADAS
6 United States Attorney
7 Districts of Guam and the NMI

8 By: /s/ Jessica F. Cruz
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SCHEDULE A TO NOTICE OF INTENT TO TAKE
THIRD PARTY ORAL DEPOSITION WITH SUBPOENA DUCES TECUM

1. Current bank statements for the past twelve (12) months from all domestic and foreign banks or other financial institutions where any sole proprietorship, partnership or corporation in which you are joint with Roland Kaipat and owns any interest.
2. Current bank statements for the past twelve (12) months from all domestic and foreign banks or other financial institutions where you, joint with Roland Kaipat, have an account of any kind, including but not limited too, time certificate of deposits.
3. All trust agreements in which you, joint with Roland Kaipat, are named settlor, trustee, or beneficiary.
4. All deeds, leases, contracts, and other documents evidencing encumbrances of any kind on real property owned jointly with Roland Kaipat.
5. All deeds of trusts, mortgages, or other documents evidencing encumbrances of any kind on real property owned jointly with Roland Kaipat in which you, joint with Roland Kaipat, have any ownership interest.
6. A listing of all stock, bonds, or other securities of any class you own jointly with Roland Kaipat, including options to purchase any securities and the actual instruments if in your possession.
7. Current brokerage statements for the past twelve (12) months from any stock brokerage firm or similar entity where you, joint with Roland Kaipat, have an account of any kind.
8. Title to any motor vehicle jointly owned with Roland Kaipat.
9. All life insurance policies held by you in which Roland Kaipat is either the insured or the beneficiary.
10. All promissory notes held by you, and all other documents evidencing any money owed to you, jointly with Roland Kaipat, either now or in the future.
11. All deeds, titles, bills of sale, or other documents prepared in connection with any transfer of real or personal property made with you to Roland Kaipat or jointly with Roland Kaipat, either by gift, sale, or otherwise.
12. All documents evidencing any interest you have with Roland Kaipat in any pension plan, retirement fund, or profit sharing plan.